

# Exhibit 1

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February 3, 2005

**VIA FEDERAL EXPRESS**

John A. Macoretta, Esq.  
Spector, Roseman & Kodroff, P.C.  
1818 Market Street, Suite 2500  
Philadelphia, PA 19103

**Re: In re Pharmaceutical Industry Average Wholesale Price Litigation**

Dear John:

We write regarding a number of issues relating to the document and data production of the Johnson & Johnson Group defendants.

First, enclosed please find a copy of the Practice Management Assistant software from Centocor. The media is Bates numbered MDL-CEN 00103692. Please let me know if you have any questions about this media.

Second, you have requested a time for a conference call with Johnson & Johnson employees who can answer your experts' questions regarding the direct sales transactional data that we have provided to you. The available starting times for a meeting are Monday, February 7 at 2 pm and Wednesday, February 9 at 12:30 to 2. Please let me know if these times work for you and your experts. Also, please provide to me as soon as possible a list of questions that your experts expect to have regarding the direct sales data.

Third, enclosed please find one CD that contains transactional data reflecting direct sales data for the Johnson & Johnson Group products for the year 2003. The CD is labeled MDL-HCS 00000275971. The data is contained on a single database that is entitled Daf\_Data\_2003\_01\_30\_2005.mdb. Please let me know if you have any difficulties reading this CD.

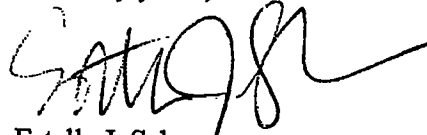
Fourth, we have discovered that certain documents in the productions from Janssen, OMP and HCS were produced out of order due to a technical glitch. We have resolved the problem and enclose seven CDs for loading into your database that will correct the issue. Please copy the contents of these CDs into the root directory where you have stored your images. You may be prompted to overwrite some files that currently exist and you should overwrite these files. This production corrects this problem by re-producing certain documents at the end of the production and designating certain pages within the production as left intentionally blank. This process will not remove any documents that have been produced nor will it add any documents

John A. Macoretta, Esq.  
February 3, 2005  
Page 2

to your database, it merely corrects places where documents were produced out of order. Please let me know if you have any questions about this process.

Fifth, enclosed please find a list of the OBI sales representatives, by region, that are listed as Tier One for the President's Cup Award. These representatives were all in the Oncology franchise and had responsibility for calling on physicians' offices. Per our conversation last week, we will send an e-mail to twenty of these employees that you designate asking them to produce any relevant files they may possess. We have also enclosed a listing of Centocor Sales Representatives who received sales awards. We have included the top ten ranked sales representatives for each year, however, as we discussed last week, we have agreed to contact a total of twenty representatives. Please select the names that you would like us to contact and provide us with a list.

Sincerely yours,



Estella J. Schoen

Enclosures

**OBI SALES REPRESENTATIVES**

**President's Cup Winners 2001 – 2003**

**Oncology HPS Top Reps: 2001**

**25 Tier One Reps**

**Southwest:**

Lisa L.

Lecia S.

Glen S.

Scott S.

**Western:**

Nina A.

Delaney C.

Keri C.

Jeffery L.

Kathy R.

**Eastern:**

Frances B.

Emily B.

Yilan C.

Nicolette O.

**Mid-Atlantic:**

Jennifer A.

Rachel B.

Joseph C.

Dona H.

**Southwest:**

Jill C.

George M.

David R.

Claudia T.

**MidWest:**

Bernard C.

Anne F.

Michael K.

Carol S.

**Oncology HPS Top Reps: 2002**

**25 Tier One Reps**

**Southeast:**

Leona K.  
Cassandra M.  
Glen S.  
Rodney T.

**Western:**

Janeen B.  
Sandra H.  
Jeffery L.  
Brady P.  
Kathy R.

**Eastern:**

Nina A.  
Yilan C.  
Mary Ann L.  
James M.

**Mid-Atlantic:**

Liane C.  
Sean F.  
Dona H.  
Amy M.

**Southwest:**

Charles A.  
Samantha D.  
Peter L.  
James W.

**Mid-West:**

Kathleen H.  
Scott M.  
John R.  
Christy S.

**Oncology HPS Top Reps: 2003**

**New England:**

Robert Sasvari  
Noel Auguston  
Shari Halpern  
Donald Rahl  
James Michalak

**West:**

Kathy Radich  
Sylvia Fuller  
Victoria Warren  
Shirley Huang  
Janeen Braham

**Rocky Mountain:**

Mun Chae  
Kimberlee Hohmann  
James Wheeler  
Steven Gamble  
Richard Alvarado

**Central:**

Christopher Dozer  
Angela Trindle  
Scott Williamson  
Kristen Yohe  
Jon Peacock

**Great Lakes:**

Kathleen Hennessey  
Scott Meredith  
Nicole Mathis  
Byron Ramos  
Steven Sams

**Southeast:**

Paul Rowland  
Penny Crenshaw  
Thomas Rodney  
Jeffrey Dupre  
Asdrubal Delgado

**Mid-Atlantic:**

Kristi Michel  
Giselle Arvelo  
Erica Barry  
Marc Dimino  
Anne Hurley

**East:**

Nina Asgari  
Genevieve Bernier  
Kenneth Lenoci  
Mary Limone  
Nicole Kelly

**CENTOCOR SALES REPRESENTATIVES**  
**Top Ten Representatives 2000 – 2003**

2000	
Rank	Name
1	Sharon C.
2	Lisa U.
3	Amy M.
4	Keith V.
5	Rick L.
6	Joan E.
7	Renee D.
8	Dorothy S.
9	Chris K.
10	Juli C.

2001	
Rank	Name
1	Janet N.
2	Mary C.
3	Ginger S.
4	Darlene C.
5	Sharon C.
6	David P.
7	Mark P.
8	Mark G.
9	Janice O.
10	Leslie H.



2002	
Rank	Name
1	Unassigned
2	Melissa F.
3	Nugyen C.
4	Unassigned
5	Janet N.
6	Michael K.
7	David P.
8	Mark R.
9	Amy M.
10	Michael M.

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Rank	Name
1	Jason O.
2	R. Kerry (Robert) C.
3	Lynn S.
4	Jennifer P.
5	Joan W.
6	Janice O.
7	Jeffrey F.
8	Curtis W.
9	Frank C.
10	Sharon C.